

FILED

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

JUL 09 2019

U.S. DISTRICT COURT-WVND
CLARKSBURG, WV 26301

UNITED STATES OF AMERICA,

v.

⁽¹⁾
CHRISTIAN STEVENS and
STEVEN SOMERS, ⁽²⁾

Defendants.

Criminal No.

1:19cr39 TSK

Violations:

18 U.S.C. § 2
18 U.S.C. § 922(a)(6)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(a)(2)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Aiding and Abetting a False Statement During Purchase of Firearms)

On or about December 6, 2016, in Monongalia County, in the Northern District of West Virginia, defendants **CHRISTIAN STEVENS** and **STEVEN SOMERS**, aiding and abetting each other, in connection with the acquisition of firearms, that is an F.N. pistol, model Five-SeveN, 5.7x28mm caliber, serial number 386304882, and a Diamondback Arms Inc. pistol, model DB-15, 5.56mm caliber, serial number DB1550734, from a Federal Firearms Licensee, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to said Federal Firearms Licensee, which statement was intended and likely to deceive said Federal Firearm Licensee, as to a fact material to the lawfulness of such sale of the said firearm to defendant **CHRISTIAN STEVENS** under chapter 44 of Title 18, in that the defendant **CHRISTIAN STEVENS** represented himself to be the actual purchaser of the firearm, when in fact, as he and **STEVEN SOMERS** then and there well knew, **STEVEN SOMERS** was the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNT TWO

(Aiding and Abetting a False Statement During Purchase of Firearms)

On or about February 2, 2017, in Monongalia County, in the Northern District of West Virginia, defendants **CHRISTIAN STEVENS** and **STEVEN SOMERS**, aiding and abetting each other, in connection with the acquisition of firearms, that is a Masterpiece Arms pistol, model MPA930 SST, 9mm caliber, serial number V9468, from a Federal Firearms Licensee, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to said Federal Firearms Licensee, which statement was intended and likely to deceive said Federal Firearm Licensee, as to a fact material to the lawfulness of such sale of the said firearm to defendant **CHRISTIAN STEVENS** under chapter 44 of Title 18, in that the defendant **CHRISTIAN STEVENS** represented himself to be the actual purchaser of the firearm, when in fact, as he and **STEVEN SOMERS** then and there well knew, **STEVEN SOMERS** was the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNT THREE

(Aiding and Abetting a False Statement During Purchase of Firearms)

On or about March 3, 2017, in Marion County, in the Northern District of West Virginia, defendants **CHRISTIAN STEVENS** and **STEVEN SOMERS**, aiding and abetting each other, in connection with the acquisition of firearms, that is a Springfield pistol, model XD Mod 2, 9mm caliber, serial number GM898351, and an F.N. pistol, model FNS40, .40 caliber, serial number CSU0020413, from a Federal Firearms Licensee, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to said Federal Firearm Licensee, which statement was intended and likely to deceive said Federal Firearm Licensee, as to a fact material to the lawfulness of such sale of the said firearm to defendant **CHRISTIAN STEVENS** under chapter 44 of Title 18, in that the defendant **CHRISTIAN STEVENS** represented himself to be the actual purchaser of the firearm, when in fact, as he and **STEVEN SOMERS** then and there well knew, **STEVEN SOMERS** was the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNT FOUR

(Aiding and Abetting a False Statement During Purchase of Firearms)

On or about May 8, 2017, in Marion County, in the Northern District of West Virginia, defendants **CHRISTIAN STEVENS** and **STEVEN SOMERS**, aiding and abetting each other, in connection with the acquisition of firearms, that is a Glock pistol, model 19, 9mm caliber, serial number BECH872, from a Federal Firearms Licensee, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to said Federal Firearm Licensee, which statement was intended and likely to deceive said Federal Firearm Licensee, as to a fact material to the lawfulness of such sale of the said firearm to defendant **CHRISTIAN STEVENS** under chapter 44 of Title 18, in that the defendant **CHRISTIAN STEVENS** represented himself to be the actual purchaser of the firearm, when in fact, as he and **STEVEN SOMERS** then and there well knew, **STEVEN SOMERS** was the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNT FIVE

(Unlawful Possession of a Firearm)

On or about June 21, 2018, in Lewis County, in the Northern District of West Virginia, defendant **STEVEN SOMERS** possessed a firearm, that is an F.N. pistol, model Five-SeveN, 5.7x28mm caliber, serial number 386304882, having previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, that is the felony offense of Possession with the Intent to Distribute a Controlled Substance, Marijuana, in the Circuit Court for Prince George's County, Maryland, in Criminal Number CT171331X, and did so knowingly, said firearm having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATION

Gun Control Act

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1), the government will seek the forfeiture of any firearm and any ammunition involved in or used in any knowing violation of Title 18, United States Code, Sections 922(a)(6), 922(g)(1), and 924(a)(2), and including a F.N. pistol, Five-Seven, .57 caliber, serial number 386304882, and nineteen (19) rounds of 5.7x28mm caliber ammunition.

A true bill,

/s/ _____
Grand Jury Foreperson

/s/ _____
WILLIAM J. POWELL
United States Attorney

Traci M. Cook
Assistant United States Attorney